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[Additional Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

RON BERGMAN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

CARIBOU BIOSCIENCES, INC., RACHEL E.
HAURWITZ, JASON V. O'BYRNE, RYAN
FISCHESSER, SCOTT BRAUNSTEIN,
ANDREW GUGGENHIME, JEFFREY LONG-
MCGIE, and NATALIE R. SACKS,

Defendants.

Case No.: 4:23-cv-01742-YGR

JOINT STIPULATION AND
~~[PROPOSED]~~ ORDER REGARDING
CASE SCHEDULE

Judge: Hon. Yvonne Gonzalez Rogers
Courtroom: 1 – 4th Floor

1 Lead Plaintiff Ron Bergman (“Plaintiff”) and Defendants Caribou Biosciences, Inc., Rachel
 2 E. Haurwitz, Jason V. O’Byrne, Ryan Fischesser, Scott Braunstein, Andrew Guggenhime, Jeffrey
 3 Long-McGie, and Natalie R. Sacks (collectively, “Defendants”), by and through their respective
 4 counsel, respectfully submit this Stipulation and [Proposed] Order setting forth a schedule for the
 5 filing of an amended complaint, a motion to dismiss, an opposition to the motion to dismiss, and a
 6 reply to the opposition to the motion to dismiss.

7 **WHEREAS**, on May 8, 2023, the Court entered an order directing the parties to submit a
 8 proposed scheduling order within 14 days of appointment of lead plaintiff [Docket No. 11];

9 **WHEREAS**, on July 6, 2023, the Court entered an Order Appointing Lead Plaintiff and Lead
 10 Counsel [Docket No. 26];

11 **WHEREAS**, Plaintiff presently intends to file an amended complaint;

12 **WHEREAS**, the Defendants presently intend to move to dismiss any complaint in this action;

13 **WHEREAS**, pursuant to the Private Securities Litigation Reform Act of 1995, codified at 15
 14 U.S.C. § 77z-1 and 78u-4 (“PSLRA”), all discovery and other proceedings in this action are stayed
 15 pending the determination of the Defendants’ planned motion to dismiss;

16 **NOW, THEREFORE**, Plaintiff and the Defendants stipulate and agree, subject to approval
 17 of the Court, as follows:

- 18 1. Plaintiff shall file an amended complaint (the “AC”) within 60 days of entry of
 19 this order;
- 20 2. The Defendants shall answer or otherwise respond to the AC within 45 days of
 21 its filing;
- 22 3. If a motion to dismiss is filed, Plaintiff shall file any opposition within 45 days
 23 of the filing of any motion to dismiss;
- 24 4. The Defendants shall file any reply within 20 days of the filing of the
 25 opposition; and
- 26 5. Consistent with Federal Rule of Civil Procedure 6(a)(1)(C), if any of the
 27 deadlines set forth above fall on a Saturday, Sunday, or a legal holiday, the filing shall be
 28 made on the next day that is not a Saturday, Sunday, or legal holiday.

1 Dated: July 17, 2023

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2 By: /s/Laurence M. Rosen
3 Laurence M. Rosen

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Co-Lead Counsel for Lead Plaintiff and for the Class

17 Dated: July 17, 2023

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By: /s/ Jonathan A. Shapiro
Jonathan A. Shapiro

Counsel for Defendants Caribou Biosciences, Inc., Rachel E. Haurwitz, Jason V. O'Byrne, Ryan Fischesser, Scott Braunstein, Andrew

*Guggenhime, Jeffrey Long-McGie, and Natalie
R. Sacks*

SIGNATURE ATTESTATION

Pursuant to Local Civil Rule 5-1(h)(3), I attest under penalty of perjury that each of the other signatories have concurred in the filing of this document.

July 17, 2023

By: /s/ Laurence M. Rosen

Laurence M. Rosen

IT IS SO ORDERED

Dated: 7/19/2023


Hon. Yvonne Gonzalez Rogers
United States District Court Judge